

1 Ramon Rossi Lopez - rlopez@lopezmchugh.com
(California Bar Number 86361; admitted *pro hac vice*)
2 Lopez McHugh LLP
100 Bayview Circle, Suite 5600
3 Newport Beach, California 92660
949-812-5771

4 Mark S. O'Connor (011029) – moconnor@beusgilbert.com
5 BEUS GILBERT, PLLC
701 N.44th St.
6 Phoenix AZ 85008
480-429-3019
7 *Co-Lead/Liaison Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
11 Liability Litigation

No. MD-15-02641-PHX-DGC

12 **PLAINTIFFS' NOTICE OF LODGING**
13 **DOCUMENT UNDER SEAL**
14 **REGARDING PLAINTIFFS' TRIAL**
BRIEF ON THIRD PARTY FAULT

15 Pursuant to LRCiv 5.6(d), Plaintiffs submit this Notice of Lodging Document
16 Under Seal regarding Plaintiffs' Response to Defendants' Trial Brief on Third Party Fault.

17 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the
18 Court the document listed on Exhibit A to this Notice.

19 Defendants contend that the document listed in Exhibit A is confidential and
20 should be filed under seal. As required under LRCiv 5.6(d), Plaintiffs certify that on April
21 23, 2019, the parties met and conferred in good faith and were unable to agree about
22 whether the document is confidential under the Protective Order and should be filed under
23 seal. Plaintiffs do not believe that the disputed document warrants continued confidential
24 treatment as proprietary or sensitive trade secret information.

25 This dispute notwithstanding, the parties have agreed to continue to meet and
26 confer on the document at issue.
27
28

1 RESPECTFULLY SUBMITTED this 25th day of April 2019.

2 BEUS GILBERT, PLLC

3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor (011029)

5 701 N.44th St.

6 Phoenix AZ 85008

7 LOPEZ McHUGH LLP

8 Ramon Rossi Lopez (CA Bar No. 86361)

9 (admitted *pro hac vice*)

10 100 Bayview Circle, Suite 5600

11 Newport Beach, California 92660

12 *Co-Lead/Liaison Counsel for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Jessica Gallentine

EXHIBIT A

Ex. C, Trial Ex. 908, 5/11/2005 Dear Colleague Letter, to Plaintiffs' Response to Defendants' Trial Brief on Third Party Fault.